## 800K 52 PASE 264

VERNON P. CLEM MARGARET C. CLEM IN THE

CIRCUIT COURT

PLAINTIFFS

FOR

FREDERICK COUNTY

ALL PERSONS HAVING OR CLAIMING TO HAVE ANY INTEREST IN THE PROPERTY HEREIN DESCRIBED

MARYLAND

CIVIL NO. 1545E

DEFENDANT

## MOTION FOR SUMMARY JUDGMENT

Plaintiffs, Vernon P. Clem and Margaret C. Clem, by their attorney, Tod P. Salisbury, pursuant to Rule 2-501 moves for summary judgment in the above-captioned case and as grounds therefore states:

- 1) That an Order of Publication requiring an answer or other responsive pleading in this case by February 17, 1986 was entered on December 18, 1985.
- 2) That no answer or other responsive pleading has been filed.
- 3) That there is no genuine dispute as to any material fact in this matter and Plaintiff is entitled to judgment as a matter of law.
- 4) That Plaintiffs filed with their Complaint Affidavits in support thereof which Affidavits are incorporated herein by reference in compliance with Rule 2-501(c).

WHEREFORE, Plaintiffs move that the Court grant judgment quieting title to the property which is the subject of these proceedings in Plaintiffs.

Respectfully submitted,

Tod P. Salisbury

Attorney for Plaintiff 53 East Patrick Street Frederick, Maryland 21701

John Jan Jan 19 1901 SALISBURY & SALISBURY ATTORNEYS AT LAW FREDERICK, MARYLAND

21701